

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TROY MILAN,

*Plaintiff,*

v.

Civil Action No.:

HAYES II ENTERPRISE, LLC;  
JAMEL HAYES, A/K/A JERMAL  
HAYES, AND/OR KIM JERMAL  
HAYES; AND BLUE HILL  
SPECIALTY INSURANCE  
COMPANY, INC.,

*Defendants.*

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**NOTICE OF REMOVAL**

**TO: PLAINTIFF'S COUNSEL**

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**CO-DEFENDANT'S COUNSEL**

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**PLEASE TAKE NOTICE** that Defendants, Hayes II Enterprise, LLC and Jamel Hayes, improperly identified as Jermal Hayes and/or Kim Jermal Hayes, by and through their undersigned counsel of record, pursuant to U.S.C. §§ 1441 and 1332, and hereby file this Notice of Removal of this action from the State Court for the County of Fulton, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

This case is being removed with the consent of co-Defendant Blue Hill Specialty Insurance Company.

In support of this Notice of Removal, the Defendants have filed contemporaneously herewith their Brief in Support of Removal and accompanying Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, the Defendants respectfully request that this Court enter an Order removing this action from the State Court for the County of Fulton, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

This the 22<sup>nd</sup> day of May, 2023.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

          x           Electronically filing this document with CM/ECF which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

          x           Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

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This 22<sup>nd</sup> day of May, 2023.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

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